

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Plastag Holdings L.L.C.  
Attn: Tom Richardson  
1800 Greenleaf  
Elk Grove Village, Illinois 60007

Application No.: 98080034

I.D. No.: 031440ALR

Applicant's Designation:

Date Received: May 3, 2004

Subject: Printing Facility

Date Issued:

Expiration Date: (Five years)

Location: 1800 Greenleaf, Elk Grove Village

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of six silk screen printing presses, three coldset lithographic printing presses and four laminators pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM)). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
- 2a. This permit is issued based upon the lithographic printing presses being exempt from the requirements of 35 Ill. Adm. Code Part 218, Subpart H: Printing and Publishing, Section 218.407: Emission and Control Requirements for Lithographic Printing Lines On and After March 15, 1996. This is consequence of the combined daily emission rate of VOM from subject presses never exceeding an applicability threshold of 100 lb/day (including solvents used for cleanup operations associated with the lithographic printing line(s)) established by Section 218.405(d)(2) and determined in accordance with Section 218.411(a)(1)(B).
- b. The VOM emissions from coldset lithographic printing operations shall not exceed 100 lb/day, 1.5 ton/mo, 10.7 ton/yr.
- c. The VOM emissions shall be determined from the following equation on a monthly basis:

$$\Sigma(M_{1i} \times C_{1i}) - \Sigma(W_{1j} \times C_{1j}), \text{ where:}$$

M<sub>i</sub> - VOM-containing raw material usage (gal/month);

C<sub>i</sub> - VOM content of the raw material (lb/gal);

W<sub>j</sub> - waste material shipped off-site (gal/month);

C<sub>j</sub> - VOM content of the waste material (lb/gal).

- d. These limits define the potential VOM emissions and are based on the actual emissions determined from the maximum production capacity.
  - e. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- 3a. The VOM emissions from the silk screen printing and laminating operations shall not exceed 2.8 ton/mo and 13.7 ton/yr.
- b. The VOM emissions shall be determined from the following equation on a monthly basis:

$$\Sigma(M_{si} \times C_{si}) - \Sigma(W_{sj} \times C_{sj}), \text{ where:}$$

M<sub>si</sub> - VOM-containing raw material usage (gal/month);

C<sub>si</sub> - VOM content of the raw material (lb/gal);

W<sub>sj</sub> - waste material shipped off-site (gal/month);

C<sub>sj</sub> - VOM content of the waste material (lb/gal).

- c. These limits define the potential VOM emissions and are based on the actual emissions determined from the maximum production capacity.
  - d. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
4. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP) permit.
5. The Permittee shall maintain monthly records of the following items:
- a. Names and amounts of inks, thinners, retarders and adhesives used in silk screening and laminating operations (gal/mo);
  - b. Names and amounts of lithographic inks, fountain solutions and clean-up solvents used (gal/mo);

- c. VOM content of materials in items (a) and (b) (lb/gal);
  - d. The number of days during that calendar month that lithographic printing lines were in operation;
  - e. Certified amount of waste shipped off-site (gal/mo) and its VOM content (lb/gal);
  - f. VOM emissions calculations for lithographic printing presses to demonstrate an exemption level of the daily VOM emissions performed pursuant to the procedures of Section 218.411 (a) (1) (B). An ink emission adjustment factor, specified in 218.411(a) (1) (B) (iii), shall not be used because of absence of VOM retention in the plastic substrate; and
  - g. VOM and HAP emission calculations for total facility (ton/mo, ton/yr).
6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
7. If there is an exceedance of the requirements of this permit, as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released, a copy of the relevant records, and a description of the exceedance or violation, and efforts to reduce emissions and future occurrences.
8. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year:
- a. Names and amounts of VOM-containing materials used at the facility (gal/year); and
  - b. VOM content of materials in item (a) (lb/gal).
- If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control - Regional Office  
9511 West Harrison  
Des Plaines, Illinois 60016

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:VJB:

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Printing Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

Emission Units	VOM Emissions (tons/yr)	HAP Emissions (tons/yr)	
		Single HAP	Total HAP
Lithographic Presses	10.7	--	--
Silk Screen Presses/ Laminators	13.7	--	--
Plant-Wide		10	25
Total	24.4	10	25

DES:VJB: